

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Revision of the Broadcast Auxiliary Service	)	ET Docket No. 01-75
	)	
Digital Modulation for all TV BAS Bands	)	RM-9418
	)	
Low-Power Video Assist Devices	)	RM-9856
	)	

To: The Commission

**COMMENTS OF COX BROADCASTING, INC.  
IN SUPPORT OF SBE REQUEST FOR TEMPORARY STAY**

By these comments, Cox Broadcasting, Inc. (“Cox”) hereby supports the request of the Society of Broadcast Engineers, Incorporated (“SBE”) for a temporary one-year stay of the Prior Coordination Notice (“PCN”) frequency coordination requirement for most fixed, point-to-point Broadcast Auxiliary Service (“BAS”) stations. As indicated in SBE’s request, there is sufficient reason to question the reliability of BAS site coordinates in the Commission’s Universal Licensing System (“ULS”), which renders compliance with the PCN requirement impractical.<sup>1</sup> Cox agrees with SBE’s conclusion that parties should be allowed to provide the Commission with correct site coordinates without incurring burdensome administrative fees.<sup>2</sup> In the event the Commission declines to grant a temporary stay of the PCN requirement, Cox

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<sup>1</sup> SBE Request at 2.

<sup>2</sup> *Id.* at 2-3.

echoes the request of SBE for the Commission to provide guidance for how broadcasters should treat ULS records with missing site coordinates.<sup>3</sup>

Respectfully submitted,  
**COX BROADCASTING, INC.**

By: /s/ Kevin F. Reed

Kevin F. Reed  
Scott S. Patrick

Its Attorneys

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Dated: April 15, 2003

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<sup>3</sup> *Id.* at 3.

## **CERTIFICATE OF SERVICE**

I, Rayya Khalaf, a legal secretary at the law firm of Dow, Lohnes & Albertson, PLLC, do hereby certify that on this 15th day of April 2003, I caused a copy of the foregoing “Comments of Cox Broadcasting, Inc. in Support of SBE Request for Temporary Stay” to be served on the following via first-class U.S. mail, postage prepaid:

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/s/ Rayya Khalaf  
Rayya Khalaf